

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAVID WILLIAM WOOD,
Plaintiff,

v.

Civil No. 3:15-cv-00594-MHL

CREDIT ONE BANK, N.A.,
Defendant.

DEFENDANT CREDIT ONE BANK DEPOSITION DESIGNATIONS

Defendant Credit One Bank, by counsel, designates the following excerpts from Allan John Shutt's ("Shutt") deposition transcript from his deposition on June 8, 2016 and Alexandra Chu's ("Chu") deposition transcript from her deposition of May 11, 2016, as excerpts which may be used or introduced for any and all purposes at trial.¹

I. ALLAN JOHN SHUTT

From Page/Line	To Page/Line
6:10	6:13
6:19	6:25
7:10	7:12
7:16	7:20
7:23	7:25
8:1	8:9
10:18	10:21
14:13	14:17
14:23	14:25
15:2	15:5
30:21	30:24
33:15	33:25

¹ Neither Shutt nor Chu is currently employed by Credit One Bank, and both currently reside more than 100 miles from the Eastern District of Virginia. Accordingly, both witnesses are unavailable such that their deposition testimony may be offered for any purpose pursuant to Fed. R. Civ. P. 32(a)(4)(B).

From Page/Line	To Page/Line
35:11	35:14
36:2	36:9
39:15	40:3
43:2	44:21
46:4	46:6
46:9	46:16
46:21	47:11
47:13	47:22
49:14	50:13
50:25	51:1
51:4	51:9
51:13	51:25
52:9	52:25
53:1	53:5
53:15	54:10
56:5	56:7
56:15	57:5
57:24	58:10
59:24	59:24
60:1	60:15
60:20	61:7
62:5	63:15
65:23	65:25
66:2	66:18
71:2	71:22
75:10	75:25
76:16	77:15
77:19	77:24
78:9	78:13
78:23	78:25
79:1	80:17
80:22	82:8
82:19	82:24
83:2	83:10
84:11	86:1
87:25	88:4
88:15	89:13
90:5	90:9

From Page/Line	To Page/Line
90:11	91:9
92:11	93:2
93:14	94:7
94:18	94:20
95:5	95:22

II. ALEXANDRA CHU

From Page/Line	To Page/Line
7:19	7:22
14:14	14:19
14:25	15:1
15:4	15:13
15:20	15:22
16:2	16:6
16:17	16:20
16:24	17:16
20:2	20:7
21:1	21:16
22:11	22:24
23:3	23:14
27:1	27:23
34:25	35:1
35:4	35:23
36:22	37:3
37:17	39:15
44:15	44:23
45:23	46:14
46:21	46:23
56:8	56:13
57:14	57:19
62:3	62:6
62:11	62:12
62:15	62:16
69:10	69:14
69:25	70:16
70:19	70:24
71:3	72:7

From Page/Line	To Page/Line
76:3	76:13
86:13	86:15
90:6	90:10
108:10	109:1
109:15	109:19
110:1	111:17
111:21	111:23

Dated: November 22, 2017

Respectfully submitted,

CREDIT ONE BANK, N.A.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the attorneys of record.

/s/

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